

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CITY OF POCATELLO REQUESTS FOR ADMISSION
(CPI/USPS-RA1 THROUGH RA8)
(April 4, 2012)**

The United States Postal Service provides institutional responses to the above-listed requests for admission submitted by the City of Pocatello, Idaho (CPI) on March 21, 2012. Each request for admission is stated verbatim and followed by the response. To avoid confusion with interrogatories 1-8 directed by CPI to the Postal Service on the same date, the Postal Service herein designates the requests for admission as CPI/USPS-RA1 through RA8.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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April 4, 2012

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO CITY OF POCA TELLO REQUEST FOR ADMISSION**

CPI/USPS-RA1: You are requested to admit that the Pocatello CSMPC, hereinafter referred to as “Pocatello AMP,” is customarily ranked as one of the top performing plants in its District and Region.

RESPONSE

The administration of the Postal Service divided into Areas that are further subdivided into Districts. The Postal Service does not admit to ranking the performance of mail processing plants within an Area or District on the basis of custom. Any comparisons among plants would be based upon performance metrics. It is inappropriate to refer to a postal facility as an AMP. AMP is an acronym for the Area Mail Processing guidelines for operational consolidation review analysis that are published in USPS Handbook PO-408.

RESPONSE OF THE UNITED STATES POSTAL SERVICE

TO CITY OF POCA TELLO REQUEST FOR ADMISSION

CPI/USPS-RA2: You are requested to admit that the Pocatello AMP is profitable for the United States Postal Service based on production ratings and efficiency ratings from the Pocatello AMP exceeds the expenses attributable to the Pocatello AMP.

RESPONSE

It is unclear from this question how the following terms are defined:

- profitable;
- production ratings; and
- efficiency ratings.

Accordingly, the Postal Service is unable to formulate either an admission or denial of the assertion contained in the request.

RESPONSE OF THE UNITED STATES POSTAL SERVICE

TO CITY OF POCATELLO REQUEST FOR ADMISSION

CPI/USPS-RA3: You are requested to admit that as a result of closing the Pocatello AMP, the USPS will necessarily have to add 26 positions in the Salt Lake City AMP.

RESPONSE

The Postal Seri admits that the following narrative passage summarizing page 37 appears at page 5 of the Pocatello AMP decision package:

In this feasibility study, 57 craft employees will be impacted in the Pocatello CSMPC. Salt Lake City craft staffing increases by 26 positions and includes additional mail processing due to additional volume and from maintenance employees as per the HQ Maintenance review. The Management staffing increases are due to vacant positions at Salt Lake City.

RESPONSE OF THE UNITED STATES POSTAL SERVICE

TO CITY OF POCATELLO REQUEST FOR ADMISSION

CPI/USPS-RA4: You are requested to admit that the USPS announced the approval of closing AMP's across the Nation prior to the moratorium date of May 15, 2012.

RESPONSE

The Postal Service admits that February 23, 2012, precedes May 15, 2012.

However, contrary to the mistaken premise underlying this request for admission, the moratorium applies only to implementation of changes in operations and service; it does not operate to forbid the announcement of plans for changes in operations and service or the development of plans for implementation before its conclusion.

RESPONSE OF THE UNITED STATES POSTAL SERVICE

TO CITY OF POCATELLO REQUEST FOR ADMISSION

CPI/USPS-RA5: You are requested to admit that the USPS proceeded with the AMP consolidation prior to the Advisory Opinion being issued by the Postal Regulatory Commission.

RESPONSE

As of the date of the response to this request for admission and contrary to the mistaken premise underlying it, the Postal Service has taken no action to implement any operational consolidation that is related to the service change initiative under review in this docket. This is consistent with its commitment not to take any such action before the middle of May 2012. Accordingly, the Postal Service currently cannot admit to implementing any AMP consolidation related to this initiative prior to the issuance of the advisory opinion it has requested.

It remains possible that implementation of AMP consolidations associated with the instant initiative action may occur before the issuance of the advisory opinion requested in this docket, given that the litigation schedule is not expected to conclude before the latter part of July 2012. Such a possibility is consistent with 39 U.S.C. § 3661(b), as implemented by 39 C.F.R. § 3001.72.

RESPONSE OF THE UNITED STATES POSTAL SERVICE

TO CITY OF POCATELLO REQUEST FOR ADMISSION

CPI/USPS-RA6: You are requested to admit that the Pocatello AMP services an area that includes the Shoshone Bannock Fort Hall Reservation and is otherwise considered to be an area that you, the USPS has designated as “rural American.”

RESPONSE

The Postal Service admits that the reservation is located within a part of the service area of the Pocatello mail processing facility that could fairly be characterized as “rural.”

RESPONSE OF THE UNITED STATES POSTAL SERVICE

TO CITY OF POCATELLO REQUEST FOR ADMISSION

CPI/USPS-RA7: You are requested to admit that with the closure of the Pocatello AMP, mail delivery to the 83203 zip code, which includes the Bannock Shoshone Fort Hall Reservation, will be delayed.

RESPONSE

The Postal Service admits that it is proposing that mail delivered to the 83023 ZIP Code be subject to the same service standard changes as all other mail delivered to other destinations in the contiguous United States. Those service standard changes include downgrades from overnight to-2-day service for single-piece First-Class Mail.

RESPONSE OF THE UNITED STATES POSTAL SERVICE

TO CITY OF POCATELLO REQUEST FOR ADMISSION

CPI/USPS-R8: You are requested to admit that in the USPS Summary, all PO boxes will be moved from Pocatello's Clark Street Main Post Office and Bannock Station to the Gateway facility.

RESPONSE

The Postal Service admits that page 4 of the Pocatello AMP decision reveals a proposal to move Post Office Boxes from the Clark Street Post Office to the Pocatello CSMPC and that page 6 reveals a proposal to move Bannock Station Post Office Boxes to the Pocatello MP Annex.